

**Exhibit B – Witness Lists****PLAINTIFF’S WITNESS LIST**

<b>Witness Name/Address</b>	<b>Direct/Impeachment/Rebuttal</b>	<b>Narrative Statement of Expected Testimony</b>
Jung Keun Kim  c/o Ryan Kim Law, P.C.  222 Bruce Reynolds Blvd.  Suite 490  Fort Lee, NJ 07024	Direct	Kim will testify regarding his employment with Defendants, including the dates of employment, his roles and job descriptions, Defendants’ methods of timekeeping or lack thereof, his working hours, his pay, and Defendants’ record keeping (including their failure to provide him with a time of hire wage notice)
Jong Hwan No	Direct	JH will testify regarding his involvement with NY Meat and how he handled paying employees.
Eun Kyung No	Direct	EK will testify regarding her involvement with the restaurant and side dish business.
Ji Won Hong  5829 207 <sup>th</sup> Street, Oakland Gardens, New York 11364	Direct	Hong will testify regarding Plaintiff’s employment with Defendants, including Plaintiff’s roles and job descriptions, Defendants’ methods of timekeeping or lack thereof, Plaintiff’s working hours, his pay, and Defendants’ record keeping (including their failure to provide him with a time of hire wage notice)
Shin Tae Kim	Direct	Witness will testify regarding plaintiff’s employment with the restaurant.
Ok Hyun Lee	Direct	Witness will testify regarding plaintiff’s employment with the restaurant.
Hyung Jun Kim	Direct	Witness will testify regarding plaintiff’s employment with the restaurant.

Young Keum Chung	Direct	Witness will testify regarding plaintiff's employment with the restaurant.
Tae Min Choi	Direct	Witness will testify regarding plaintiff's employment with the restaurant.
Young Kon Kim 917) 767-0789	Direct	Mr. Kim will testify that Plaintiff had worked for San Soo Gab San II and Plaintiff did all the errands of the late Yun Hwa No day and night during his employment period for Defendants
Tae Sik Sohn 917) 657-3317	Direct	Mr. Sohn has personal knowledge that Plaintiff had worked for San Soo Gab San II and Plaintiff did all the errands of the late Yun Hwa No day and night during his employment period for Defendants
Jung Soon Lee 718) 961-4307	Direct	Bookkeeper for NYM, Hankuk Jungyuk, San Soo Gab San 2, Kono Chicken, Soo Poong Janchi
Chung Woong Lee	Direct	Witness will testify regarding plaintiff's employment with the restaurant.
Ming Zi Lin	Direct	Witness will testify regarding plaintiff's employment with the restaurant.
Sam Bong Ha 347) 523-3540	Direct	Night Chef of San Soo Gap San 2
Cesar Flores	Direct	Witness will testify regarding plaintiff's employment with the NYM.
Jorge Martinez	Direct	Witness will testify regarding plaintiff's employment with the NYM.
Mark An	Direct	Witness will testify regarding plaintiff's employment with the NYM.
Eric Valencia	Direct	Witness will testify regarding plaintiff's employment with the NYM.

Joo Yeon Lee	Direct	Owner of record of PW
Soon Kwon	Direct	Witness will testify regarding plaintiff's employment with the restaurant.
Dong Kwan Lee	Direct	Witness will testify regarding plaintiff's employment with the restaurant.
Soo Il Choi	Direct	Sous chef of San Soo Gab San 2
Bong Gu Kang	Direct	Witness will testify regarding plaintiff's employment with the restaurant.
Eun Jung Lee 646) 764-2864	Direct	GM of San Soo Gap San 2.
Soon Ok Kim 646) 515-0040	Direct	Cashier of Hankuk Jungyuk, Mr. No's wife

**DEFENDANTS' WITNESS LIST**



**Defendant New York Meat, Inc.'s  
Objection to Plaintiff's Witness List**

1. Object to following witnesses that were not previously disclosed prior to close of discovery:

Shin Tae Kim  
Ok Hyun Lee  
Hyung Jun Kim  
Young Keum Chung  
Tae Min Choi

Chung Woong Lee  
Ming Zi Lin  
Soon Kwon  
Dong Kwan Lee  
Bong Gu Kang  
Soo Ok Ki

**Defendant Picnic World's  
Objection to Plaintiff's Witness List**

Picnic World objects to following witnesses that were not previously disclosed prior to close of Discovery, as well as other reasons noted below:

<u>Name:</u>	<u>Reason for Objection</u>
Shin Tae Kim	Not disclosed during discovery; description of expected testimony too vague; cumulative
Ok Hyun Lee	Not disclosed during discovery; description of expected testimony too vague; cumulative
Hyung Jun Kim	Not disclosed during discovery; description of expected testimony too vague; cumulative
Young Keum Chung	Not disclosed during discovery; description of expected testimony too vague; cumulative
Tae Min Choi	Not disclosed during discovery; description of expected testimony too vague; cumulative
Young Kon Kim	Not disclosed during discovery; cumulative
Tae Sik Sohn	Not disclosed during discovery; cumulative
Jung Soon Lee	Description of expected testimony too vague;
Chung Woong Lee	Not disclosed during discovery; description of expected testimony too vague; cumulative
Ming Zi Lin	Not disclosed during discovery; description of expected testimony too vague; cumulative
Sam Bong Ha	Not disclosed during discovery; description of expected testimony too vague; cumulative
Soon Kwon	Not disclosed during discovery; description of expected testimony too vague; cumulative
Dong Kwan Lee	Not disclosed during discovery; description of expected testimony too vague; cumulative

Name: Reason for Objection

Soon Il Choi Not disclosed during discovery; description of expected testimony too vague; cumulative

Bong Gu Kang Not disclosed during discovery; description of expected testimony too vague; cumulative

Eun Jung Lee Description of expected testimony too vague

Soo Ok Kim Not disclosed during discovery; description of expected testimony too vague

**8. Defendants New York Meat, Inc. and Jong Hwan No's Witnesses**

1. Jong Hwan No  
355 Food Centre Drive, Suite A19  
Bronx, New York 10474

Owner of New York Meat, Inc. Will testify as to appointment of plaintiff as manager in 1997. Plaintiff was in charge of all employees which ranged from 8 to 12 employees. Plaintiff as the manager was the only individual that was authorized and in fact dealt with vendors and negotiated prices with them. This was the same for customers (restaurants and supermarkets). Plaintiff hired and fired employees and directed their work.

Plaintiff arrived at the NYM located at 600 a.m. and left when he finished his work which was between 1100 am to 100 pm.

2. Jung Soon Lee  
355 Food Centre Drive, Suite A19  
Bronx, New York 10474

Current bookkeeper who worked for over 27 years with plaintiff. She will testify that plaintiff was the manager in charge of New York Meat and that he directed employees and assisted with payroll, such as paying employees their wages.

3. Eric Valencia  
355 Food Centre Drive, Suite A19  
Bronx, New York 10474

Current driver of New York Meat, Inc. He has been with NYM for over 9 years. As the driver he will testify as to plaintiff being the manager who directed his work. He will also testify as to what else plaintiff did as manager and the hours worked by plaintiff.

4. Cesar Valencia  
355 Food Centre Drive, Suite A19  
Bronx, New York 10474

Current driver of New York Meat, Inc. He has been with NYM for over 6 years. As the driver he will testify as to plaintiff being the manager who directed his work. He will also testify as to what else plaintiff did as manager and the hours worked by plaintiff.

5. Mark An

Current manager of New York Meat, Inc. who previously worked under plaintiff. He will testify as to what plaintiff did as manager and that he performs the same work as the present manager.



6. John Pacifico - Westside Foods Inc.  
355 Food Center Drive, Building E  
Bronx, New York 10474

Owner of one of the vendors used by New York Meat. He will testify that plaintiff represented himself to be the owner/officer of New York Meat and that plaintiff advised him that he the person in charge who oversaw daily operations. He will also testify that he dealt exclusively with plaintiff who negotiated prices and placed orders with Westside Foods.

7. Austin Johnson - Austin Meat and Seafood Company  
355 Food Center Drive A-14  
Bronx, New York 10474

Sales manager will testify that he dealt with plaintiff on numerous occasions who represented himself to be the manager of New York Neat. He will testify that he negotiated prices and maintained a good business relationship with him. Since both businesses are adjacent to each other Allyn Cohen and plaintiff met each other regularly.

8. Mike Johnson - Austin Meat and Seafood Company  
355 Food Center Drive A-14  
Bronx, New York 10474

Part owner of Austin Meat. He will testify that he dealt with plaintiff on numerous occasions who represented himself to be the manager of New York Neat. He will testify that he negotiated prices and maintained a good business relationship with him.

9. Allyn Cohen - Austin Meat and Seafood Company  
355 Food Center Drive A-14  
Bronx, New York 10474

Sales manager will testify that he dealt with plaintiff on numerous occasions who represented himself to be the manager of New York Neat. He will testify that he negotiated prices and maintained a good business relationship with him. Since both businesses are adjacent to each other Allyn Cohen and plaintiff met each other regularly.

10. Charles Chong - Barn Joo Restaurant  
34 West 35<sup>th</sup> Street  
New York, New York 10001

Owner of restaurant which was a customer of NYM. He will testify that he dealt with plaintiff who represented himself as being the manager of NYM. He negotiated prices with plaintiff and also contacted him when he had a problem with any orders.

11. Jong Heon Kim - New Sansoogapsan Restaurant  
38-13 Union Street

Flushing, New York 11354

Owner of restaurant which was a customer of NYM. He will testify that he dealt with plaintiff who represented himself as being the manager of NYM. He negotiated prices with plaintiff and also contacted him when he had a problem with any orders.

12. Tae Sik Son  
38 Jessica Place  
Roslyn Heights, New York 11577

A former manager's assistant at NYM who worked under plaintiff. He will testify as to plaintiff being the manager who directed his work. He will also testify as to what else plaintiff did as manager and the hours worked by plaintiff.

13. Dong Kwan Lee  
317 High Street  
Northvale, New Jersey 07647

A former manager's assistant at NYM who worked under plaintiff. He will testify as to plaintiff being the manager who directed his work. He will also testify as to what else plaintiff did as manager and the hours worked by plaintiff.

**Schedule B**

List of Picnic World's Witnesses

1. JooYeon Lee (240-23A Oak Park Drive, Douglaston, New York 11305):

She will testify that she is the sole owner and president of Picnic World. Picnic World was incorporated in 2016 and has no relationship with New York Meat, Inc. other than being a customer. She will also testify that (a) Picnic World owns and operates a Korean restaurant, Sansoogapsan 2, (b) Plaintiff was never an employee of Picnic World, and (c) Yun Hwa No never had any part in the operation or management of Picnic World.

2. Eun Jung Lee (185-33 43<sup>rd</sup> Road, Flushing, New York 11358):

She will testify as to the management and operations of Picnic World and that (a) Plaintiff was never employed by Picnic World and (b) Yun Hwa No did not take any part in the operation or management of Picnic World. She will further testify that Picnic World never requested Plaintiff to perform work for the business. She will further testify that Picnic World keeps track of its employees' working hours through use of a timecard system.

3. Eun Kyung No (240-23A Oak Park Drive, Douglaston, New York 11305):

She will testify that Plaintiff ran errands (e.g., catered food deliveries and purchased items) for a business owned by Yun Hwa No prior to Picnic World beginning its operations in 2016.. She will further testify that Plaintiff was never an employee and that Plaintiff was always paid for any errands he may have run.

4. Bong Gu Kang (144-19 Barclay Avenue, Flushing, New York 11355)

He will testify that he has never seen Plaintiff work for Picnic World, including running errands to purchase restaurant supplies or deliver catered food.

5. Chung Woong Lee (35-35 164<sup>th</sup> Street, Flushing, New York 11358)

He will testify that Plaintiff was never employed by Picnic World and hence no payroll was ever processed for Plaintiff. He will also testify as to Picnic World's use of timecards to keep track of employees' working hours.

6. Ming Zi Lin (147-37 38<sup>th</sup> Avenue, Flushing, New York 11354)

She will testify that she has never seen Plaintiff work for Picnic World, including running errands to purchase restaurant supplies or deliver catered food.

7. Sam Bong Ha (3620 Parsons Blvd., #4B, Flushing, New York 11354)

He will testify that he has never seen Plaintiff work for Picnic World, including running errands to purchase restaurant supplies or deliver catered food.